

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIFE IS GOOD, INC.,)	
Plaintiff,)	
)	
v.)	C.A. No. 04-11290-REK
)	
LG ELECTRONICS U.S.A., INC.)	
and LG INFOCOMM U.S.A., INC.)	
Defendants.)	

PLAINTIFF LIFE IS GOOD, INC.'S RESPONSE TO DEFENDANTS LG ELECTRONICS
U.S.A., INC AND LG INFOCOMM U.S.A., INC.'S FIRST SET OF INTERROGATORIES

Plaintiff Life is good, Inc. ("Life is good") provides the following answers to the first set of interrogatories propounded by the defendants.

GENERAL OBJECTIONS

1. Life is good objects to providing any information protected by the attorney-client privilege and/or the work-product immunity doctrine.
2. Life is good objects to providing any information otherwise protected from disclosure pursuant to applicable law.
3. Life is good objects to these interrogatories to the extent that they are overly broad, unduly burdensome, vague, and/or interposed solely to harass and/or annoy Life is good.
4. Life is good objects to providing any confidential and/or proprietary business information prior to the execution of a mutually-agreeable confidentiality stipulation.
5. Life is good objects to these interrogatories to the extent that they are not reasonably anticipated to lead to the discovery of admissible evidence and/or exceed the scope of discovery

Interrogatory No. 2

Identify each product with which Plaintiff has used the LIGI Mark and Jake Symbol.

Answer to Interrogatory No. 2

Subject to the General Objections set forth above, Life is good states that, without limitation, it and its predecessors have used the "Life is good" and "Jake" marks in connection with the following products: t-shirts, shirts, sweatshirts, golf shirts, pants, shorts, jackets, outerwear, dresses, pajamas, infant and toddler clothing, tank tops, underwear, hats, visors, jewelry, blankets, towels, travel bags, backpacks, cinch sacks, water bottles, travel mugs, balls, flying discs, bandanas, gloves, mittens, dog and cat bowls, dog and cat collars, dog and cat toys, golf club accessories, coffee mugs, stickers, tire covers, plastic figures, posters, letterhead, stationary, postcards, and greeting cards. Pursuant to F.R. Civ. P. 33 (d), Life is good further answers this interrogatory by referring to the documents it will produce in response to the defendants' first request. In particular, Life is good refers to its catalogs that it has produced.

Interrogatory No. 3

Identify each retail store or outlet, including its location and address, where Plaintiff's Products have been sold or distributed.

Answer to Interrogatory No. 3

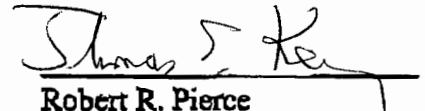
Life is good objects to this interrogatory on the grounds that it is overly broad, unduly burdensome, not reasonably anticipated to lead to the discovery of admissible evidence, and seeks confidential and proprietary information that is protected from disclosure by applicable law. Without waiving those objections, and subject to the General Objections set forth above and the execution of a mutually agreeable confidentiality stipulation, pursuant F.R. Civ. P. 33

Signed under the penalties of perjury, this 21 day of January, 2005.



Albert Jacobs, President
Life is good, Inc.

As to objections only:



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